
**Test Valley Borough Council Local Plan 2040
Regulation 18 Consultation
March 2022**

Introduction

This document represents a formal response by Go South Coast regarding the above Local Plan consultation. Go South Coast is a wholly owned subsidiary of The Go-Ahead Group, which operates buses in many parts of England. Locally, Go South Coast operates across the south coast with its core networks based in Southampton, Poole & Bournemouth, Salisbury, Swindon and the Isle of Wight as well serving the rural communities of Dorset, Hampshire and Wiltshire. With a fleet of over 800 vehicles across all brands, we help our customers make over 47 million journeys annually in normal times. We are a major employer in the south of England with over 1900 colleagues delivering services every day of the year.

Bluestar – Southampton
Damory – rural Dorset
morebus – Bournemouth & Poole
Salisbury Reds – Salisbury
Southern Vectis – Isle of Wight
Swindon's Bus Company – Swindon
Unilink – University of Southampton
UNIBUS – Bournemouth University



Figure 1: Go South Coast Operating Area

Bus services are provided primarily through the route networks of [more bus](#), [Salisbury Reds](#), [Swindon Bus](#), [Bluestar](#) and [Southern Vectis](#). These networks are in the majority commercially operated but there is significant involvement in the tendered local bus market, together with school and college movements. The prestigious contracts to operate bus services for the University of Southampton - [Unilink](#) & Bournemouth University - [UNIBUS](#) are currently held, together with contracts for other higher education providers.

Why we're Responding

Operating as Bluestar and Salisbury Reds, we are one of the main bus operators in the Borough operating the following principle services:-

- **Bluestar 4** – Connecting Romsey to Southampton via North Baddesley, Rownhams, Lordshill and Shirley upto half hourly in the Day Monday to Saturday and hourly on Sundays;
- **Bluestar 5** – Connecting Romsey to Eastleigh and Boyatt Wood via North Baddesley and Chestnut Avenue hourly Monday to Saturday;
- **Bluestar 17** – Weston – Southampton City Centre – Adnac Park – every 10 minutes daytime;
- **Salisbury Reds X7/ X7R** – Connecting Romsey to Southampton and Salisbury via West Wellow, Whiteparish, Alderbury, Ower, Testwood, Totton and hourly;
- **Salisbury Reds Activ8** – Salisbury – Amesbury – Tidworth – Weyhill – Andover (jointly operated with Stagecoach South) half hourly daytimes.

At the heart of any approach to connectivity is the need to recognise, often in larger rural counties new developments are taking place in completely unsustainable locations in terms of transport, and that, as a result of being in the wrong place, these locations are prone to increased social isolation, lack of access to services, poor

connectivity and ultimately poor bus services if at all. We are ultimately forcing people to use the private car from the word "go". Development Plans and Development Control functions need to focus new development on locations that can accommodate sustainable transport and financially viable bus services, rather than in locations with least local resistance.

There needs to be a better connect between Local Planning and Transport Authorities to enable sustainable development. New development also needs to be physically accessible by bus and also, where appropriate, funded by the development to enable routes to develop and thrive.

Bus operators should be treated as specialist advisors on development planning, masterplanning and planning applications.

Our Response

We thought it useful to set the context of the issues likely to affect the TVBC Area area in terms of the need to access bus services before turning to the need of well-located development before responding to the various themes within the issues and options document.

The Need for Sustainable Transport to be at the Heart of the Local Plan

Evidence uncovered by Greener Journeys ("*The Impact of Congestion*", 2016) shows that there is a distinct trend across our most congested urban conurbations in the UK of bus journey times rising by – on average – almost 1% per annum. In addition, over the last 50 years, bus journey times have increased by almost 50% in the more congested urban areas. If we had protected bus passengers from the growth in congestion there would arguably be between 48% and 70% more fare paying bus passenger journeys today. Adding more cars onto the road into already congestion town centres and market towns at peak periods will have a negative impact on the environment and economy, especially if (non-entitled) school children for example, are decanted into cars.

The National Planning Policy Framework states that transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.

Investing in buses is excellent value and socially progressive. Those most likely to rely on public transport are older people, low income groups, disabled people and young people. Supporting these groups helps facilitate access to education, to jobs and services, supports independent living and many other benefits.

Buses offer a clean, environmentally friendly, flexible, accessible and affordable means of making the county's transport plan sustainable and environmentally-friendly and could aid the achievement of environmental and sustainability targets.

In rural areas, outside of some notable success stories, service provision can be patchy and it could be argued that the current approach to bus service provision in rural areas to date has failed in terms of declining patronage levels, local authority cut backs- largely as a result of austerity, and reduced service provision. This has led to what in many ways are limited and dwindling services to ghettoised public transport markets, often provided on specific days and whilst there are many exceptions to this, what does remain is largely heavily subsidised.

Therefore, in rural areas, a new approach is required to enable those economically active, to choose the bus as the mode of choice to connect to main centres and allow these users to positively improve the overall viability of bus services, which in turn enables buses to meet their social need. There is an opportunity through a new approach to enable better rural connectivity utilising new data and new modes but also growing the public transport offer better utilising public sector funding and operator flare.

Research by *Greener Journeys* show bus users create more than £64 billion worth of goods and services per year, and that there is a significant relationship between accessibility by bus and employment. A 10% improvement in access to bus services would mean 50,000 more people in work – equally reduced access would mean that communities can become cut-off as well as well as contribute to an increase in unemployment.

The DfT WebTAG unit highlights the DfT appraisal guidance which contains values estimated in a study by Mott Macdonald and the University of Leeds in 2013 that quantified the social value of a bus trip. Here, the definition of

social impacts corresponded to '... *the value bus users enjoy from accessing particular services that they would not otherwise have had easy access to*'. Based on stated preference analysis, they estimated a social value of £3.84 for concessionary pass holders and £8.17 for non-holders per return trip (2010 values and prices). This wider impact of the benefit of bus users' needs to be taken into account when assessing the impact on proposals to reduce bus service funding.

Further, an independent report looked at the role of buses in contributing to economic growth, and quantifying the benefits bus services bring. ("*Buses and Economic Growth*", *the Institute of Transport Studies, University of Leeds*). The report, published in July 2012, shows:

- People use the bus to make shopping and leisure trips with an annual value of £27.2bn, of which £21.5bn is spent in towns or cities centres;
- 1 in 10 bus commuters would be forced to look for another job if they could no longer commute by bus;
- More than 50% of students are frequent bus users and depend on the bus to get to their education or training.

Young people need reliable and affordable bus services in order to access education and employment, particularly apprenticeships. This will remain the case in the short to medium term as new technology is rolled out and becomes viable for sparse communities. Entry level jobs tend to involve unsocial hours and weekend travel so anything which would impact on people's ability to access employment needs careful consideration if it is not to have a detrimental impact on the ability of employers to find and retain local staff. This means that the apparently simple step of cutting evening and weekend bus services is often causing harm to those most in need.

For older people buses are a lifeline away from isolation and loneliness, giving them access to social activities, health services and shops. Accessible public transport is often crucial in keeping disabled people connected to their communities. Many older people in rural areas rely entirely on bus services to access healthcare, social activities, community events and shops, as well as visiting friends and family. Buses often act as a social tool to enable older people to meet on the bus.

The "*Later life in rural England*" report by Age UK is a wide-ranging assessment of the challenges facing older people living in rural areas, with lack of transport identified as a major issue given that 35% of older households do not have access to a car. The report highlights the importance of regular, convenient and reliable bus services to the lives of older people and identifies reductions in service as a serious concern, impacting on all aspects of their lives. It calls on local authorities to recognise the wider value of bus services in preventing social isolation and to base funding decisions on impact assessments and not simply on costs and the number of people using a service.

Better Located Development

The period of austerity has led to a reduction in specialist Highways and Public Transport experts within Local Authorities. This means that often, in pursuit of achieving pure housing numbers, transport issues – and in particular local transport solutions are not considered in the planning process. Indeed, they are not included in Site Specific Developer contributions, are a very poor relation in CIL 123 lists and rarely attract pump priming for local bus services. Such services need a "good run in" to be able to be commercially viable once development is built out, thus removing the potential of a financial burden for local authorities in future years.

This all leads to requests to retro-fit developments, when roads are not wide enough, the layout does not allow for bus operation on sites which are not commercially viable and cannot attract public subsidy – bringing residents on these distant estates into transport poverty. Even worse - small, unrealistic contributions allow for only unsuitable bus services that have little or no chance of survival after their seed funding ends.

Evidence submitted by Go South Coast to the National Planning Policy Framework made the point that "*At a time when developer contributions nationally have increased from £4,874m in real terms to £6,007m between 2007-2008 & 2016-2017, transport and travel contributions arising from development have declined by 70% from £462m to £131m over the same period.*" ("*The Incidence, Value and Delivery of Planning Obligations and Community Infrastructure Levy in England in 2016-17*", MHCLG, March 2018). We have severe concerns that local, deliverable transport schemes are not delivered or prioritised as big ticket, slowly delivered, complex schemes are delivered at the expense of local transport solutions.

There needs to be a better connect between Local Planning and Transport Authorities to enable sustainable development. New development also needs to be physically accessible by bus and also, where appropriate, funded by the development to enable routes to develop and thrive.

Bus operators should be treated as specialist advisors on development planning, masterplanning and planning applications.

Urban Connectivity

Urban bus networks in Hampshire are typified by two types of urban networks – town networks providing for local trips and inter urban journeys’ connecting key settlements. For buses to achieve the policy objectives of modal shift, meeting climate change targets and enabling citizens it is important that these services can see journey time improvements – but just as importantly when set against increasing journey times and reduced reliability through congestion – proven improvements to journey time reliability are essential.

As operators we can provide information to inform scheme development and information to the public – we see the principle role for local Transport and Highway Authorities as one where buses are enabled to gain access to key nodes such as as town centres and cultural areas but also are prioritised. New development needs to be bus friendly and funded to delivery wider outcomes for a period of time but the local authority also needs to ensure roadside infrastructure is a quality product.

Rural Connectivity

Poor access to public transport can have a devastating impact on rural areas. If people do not have access to a car, they can be reliant on buses to get to school, hospital, and visiting friends or to go to the shops. If that bus service disappears it can leave whole villages completely isolated.

For many people in rural areas buses are essential, not just for work and education, but for independence. Buses are also important for leisure use, helping people gain access to and travel around the countryside more sustainably; they often also contribute to the overall visitor experience.

The Need for Change in the Approach to Rural Connectivity

Whilst there is a need for new rural mobility solutions that add to and complement the existing provision, only by focussing on the economic benefit and indeed potential of the bus, can bus services through rural areas stop their decline, improve in frequency and quality and most importantly be economically viable – provided by quality operators at minimal, if any, cost to the public purse. Any initiatives which threaten to reduce bus patronage could have unintended consequences in terms of further rural bus service reductions and mobility isolation of communities and individuals.

This means enabling buses that connect to, through and from rural areas. For buses to run longer through every day creating not only links to health establishments but also town, village and city centres, neighbourhood centres, leisure and employment areas so that buses become an essential part of the community – a mode of choice for getting between places rather than a mode of last resort. The bus needs to offer flexibility to its user.

Sometimes it is better to connect communities to bus services rather than every road covered by a marauding coach or double decker every market day. This means using DRT, scooters, cycling and ebikes to connect to hubs which enable the biggest market for bus services with improved journey times and greater accessibility. An example is the number of cycle parking sites adjacent to bus stops along the Bluestar 1 route between Southampton and Winchester which enables people in villages and rural settlements to cycle to the main road and leave their cycle and connect to a longer distance bus service.

Reversing the Decline of County Buses

"*Buses In Crisis*" produced by the Campaign for Better Transport (2018) shows there has been a net reduction in funding of £20.2m in England for supported services in 2017/18 – a real terms cut of 9%. Since 2010 this is a real terms cut of £172m, or 46% reduction. It also demonstrates 64% of Local Authorities have reduced spending, with 36% actually increasing the supported buses budget. In essence this reflects the withdrawal of over 3,000 bus services since 2010/2011.

In December 2020 the County All Party Parliamentary Group Inquiry published "*Reversing the decline of County Buses*" which reported that the number of journeys by bus between 2009 and 2019 had declined by 97 million journeys - with 16% of all passenger journeys on England now taking place in County Areas. It also noted that over 3,000 bus routes had been reduced, altered or withdrawn between 2010 and 2018. The report identified a £348.5m funding gap in County Council budgets with socially necessary bus funding being reduced to cover children and adult social care. This clearly demonstrates the need for funding and network development to be prioritised in a new manner that acknowledges the contribution transport makes to other policy areas.

The report identified that commercial networks no longer provide adequate rural transport and it made several recommendations. Amongst these was a need to identify long term funding solutions, improved partnership arrangements and working together between the public, private and third sectors to optimise route networks and delivery through a range of passenger solutions. It also identified that bus operators should be Statutory Consultees on the planning process to help better plan new developments which we would support.

Enabling Rural Transport Access

In rural areas buses should concentrate on main settlements, where possible connecting main nodes with smaller hamlets having safe routes to key stops through other modes such as walking and cycling, and for the less able through car share and taxi bus schemes in liaison with local taxi firms.

This way it enables the bus to be able to go further and therefore be more viable in the window of time available to it. This also widens the number of potential passenger's therefore increasing viability. By basically adhering to main roads, journey time is improved rather than the somewhat dated approach to rural buses trying to be all things to all men and failing through poor journey times, falling passenger numbers and lack of viability.

Dynamic "Demand Responsive" Transit (DDRT) - services booked via apps could offer potential to improve public transport connectivity in areas where traditional bus service viability is limited. In areas where lower population densities and dispersed travel patterns limit the density/frequency of traditional public transport that is viable, can build in car-dependency.

DDRT could offer opportunities to implement services which would support strategic objectives including large expanses of areas that are beyond the walking catchment of public transport corridors. And where these areas have limited potential to support very frequent bus services to many destinations.

We would like to work with partners on developing mobility hubs which can provide access to a range of services and which reduce the need to travel which are multi-modal in nature and also provide access to other services including personal services, healthcare and IT services as well as parcel pick up and electric charging.

These could be delivered within existing communities as well as new rural developments providing better integration and access to alternative transport modes.

Local mobility hubs are conceptualised as district centre type locations where a range of mobility options and services are offered in the same place. This includes combining provision of public transport interchange, car club vehicles, high quality cycle facilities and cycle parking, taxi rank, EV charging points, and flexible space for business use (e.g. cafes, "pop up" shops etc) all linked together by improved quality public realm and include:-

- Access to shared bikes/ e-bikes
- Hub/ interchange point for DRT services and micro-consolidation points; and
- Provision of click & collect facilities.

This could be as new provision within existing settlements but also through new developments. Development Plans and Development Control functions need to focus new development on locations that can accommodate sustainable transport and financially viable bus services, rather than in locations with least local resistance.

Draft Local Plan Regulation 18 Consultation Response

Vision, Objectives and Challenges

We support the vision, however it could win a short story prize and we would expect something more snappy and less of a wheelbarrow of ideas. A vision needs to be relatable and not long-winded – a sustainable, well connected community with access to employment, education and opportunities – this needs to be the simple message of the vision.

We support the approach in terms of objectives and challenges to develop strong and healthy communities. We are very supportive, that in relation to town and city centres to *create cultural, adaptable, diverse and vibrant town centres in Romsey and Andover, including through regeneration schemes, and by securing high quality design and accessible mixed-use development that will increase vitality, whilst protecting and enhancing their historic and green assets.*"

We welcome the approach to housing as being one which *"provides a range of homes that are fit for purpose and designed to meet the needs and aspirations of different groups within the community, including a range of affordable housing and homes that meet the needs of an ageing population."* With respect to Transport and movement we are fully supportive of the approach being one where the plan will *"encourage active and sustainable modes of transport, that are accessible, safe and attractive to use, whilst also seeking to reduce the impact of travel in particular by private car. Ensure new development facilitates improvements to accessibility, safety and connectivity in our transport infrastructure."*

Spatial Strategy

We are supportive of the overall spatial strategy, however the movement element is somewhat unclear. The approach suggests one of *"Providing developments that promote active travel and invest in infrastructure to enable clean travel that reduces our impact from travel"*. We would argue better bus access can support this and needs to be amended.

We therefore would suggest that this is REWORDED to *"Providing developments that promote active travel AND PUBLIC TRANSPORT WELL AS ~~and~~ invest in infrastructure to enable clean travel that reduces our impact from travel"*.

We support Andover and Romsey being at Tier 1 of the settlement hierarchy with the hierarchy then leading to development in larger villages. This will better enable better, more sustainable development.

Strategic Policy Framework

We SUPPORT Strategic Policy 1: Countering Climate Change where *"Opportunities have been taken to maximise the potential for active and sustainable travel and minimise unnecessary travel"*.

We SUPPORT Strategic Policy 2: Delivering Healthy, Well-Designed Development WITH AMENDMENTS. We support G which states that *"the layout of new developments will be permeable and legible allowing for suitable access and movement for all users. Development will need to be designed to prioritise sustainable and active travel."* **But would suggest H is reworded from *"Where cycle and car parking infrastructure, utilities and services are required, it will be provided in appropriate and convenient locations for the users and designed to integrate positively."* to *"Where cycle and car parking AND BUS infrastructure, utilities and services are required, it will be provided in appropriate and convenient locations for the users and designed to integrate positively."*** This would highlight the need to ensure bus infrastructure is provided in developments and take account of the issues highlighted in the transport and movement comments.

Climate Change

We are keen to ensure that alternative technology can be delivered in a sustainable manner. Local Authorities need to work with operators to ensure that suitable technology existed to support alternative fuel supply. This includes work with utility suppliers to ensure that infrastructure is available to support innovation that can be realistically delivered. This matter is currently a major blocker to roll out.

If we are to ensure the success of CAZs in our cities the role of the bus must be maximised. Progress in clean diesel bus technology has dramatically exceeded diesel car technology. Real world testing of Euro VI diesel buses

demonstrates a 95% reduction in NOx emissions compared with Euro V. Modern diesel buses including retrofit of existing vehicles to Euro VI standard will deliver the reduction in NOx and other harmful emissions that is required in the time frame available. Retrofits for buses are reliable and proven to deliver Euro VI emission performance.

To ensure the success of CAZ's, decisions at national and local level must be based on evidence rather than political expediency. This means including private cars in CAZs and much tougher action on diesel cars; ensuring the cleanest and most efficient bus operation across the country; and encouraging more use of public transport and other measures to tackle congestion.

The quickest and most cost-effective solution to our air quality epidemic is to put the bus at the centre of the strategy. Policy interventions must be based on reducing emissions per passenger. This means tougher action on diesel cars; ensuring the cleanest and most efficient bus operation across the country; and, measures to encourage modal switch from car to bus.

If decision makers put buses at the centre of strategies to tackle air quality and congestion we will achieve a virtuous circle of falling costs, higher frequencies, lower fares and higher patronage. This will lead to improvements in local transport which will result in more people in work, fewer people suffering from income deprivation, more people with adult skills and more people in higher education. Policy interventions must be based on reducing emissions per passenger. This means tougher action on diesel cars; ensuring the cleanest and most efficient bus operation across the country; and, measures to encourage modal switch from car to bus.

[Town Centres & Romsey & Andover Town Centres Topic Paper](#)

We **SUPPORT** the approach with respect to Romsey and Andover Town Centres. The central Zone A being the primary shopping and cultural focus, Zone B being the outer town centre and Zone C covering upper floors enabling reuse "above the shop".

We **SUPPORT Strategic Policy 3** "*Delivering Development and Regeneration in Andover and Romsey Town Centres*" but would note the need to these locations to be connected and accessible to non-car modes and this should be reflected in Strategic Policy 4.

We **SUPPORT Strategic Policy 4:** Delivering High Quality Development in Town Centres **with AMENDMENTS** and would suggest **E is AMENDED to "Town centre development shall be visually attractive and use high quality materials creating welcoming, places and enhance a well-connected (in particular by sustainable transport modes), functional and high-quality public realm to minimise opportunities for anti-social behaviour and crime."** And H to "*Contributions will be sought toward the production of high quality, strategic, integrated public art which will help to enrich the quality, culture, heritage and vibrancy of town centres. Installations will provide in accordance with the Public Art Strategy. CONTRIBUTIONS WILL ALSO BE SOUGHT WHERE NECCESARRY TO IMPROVE CONNECTIVITY BY ACTIVE AND PUBLIC TRANSPORT"*.

It is important that buses are seen as part of the solution to revitalise the vitality and viability of town and city centres and not seen as a problem. Buses aren't dirty – clean diesel VI buses emit half the pollution of new VW Golf for example – and people need quick and easy access to these centres by mass transit modes. Most bus users use the bus to access shops both to purchase goods and to meet friends. Reducing access to services will inevitably reduce the number of customers visiting the shops and will have a far-reaching effect on the economies of those communities but also the livelihood of their traders.

Marginalising the bus will reduce the ability of younger people to access work, for older people to access the town centre and lead to car dependant development. Studies show bus passengers spend more than car drivers, spend more time in city centres and use the bus to make linked trips. Urban realm schemes therefore need to embrace this connectivity –not aim to throttle it. **We would like the Local Plan to acknowledge the role buses can play in delivering urban realm success and see policies that aim to enable city and town centre access for buses.**

[Housing & Housing Topic Paper](#)

We are keen to focus the quantum of development along existing transport corridors where possible or where development is concentrated and volumes can justify the provision of a bus service. Having higher concentrations

in a place that already has established public transport links will allow this 'network' to grow for the benefit of all residents.

We have been working with the Foundation for Integrated Transport, RAC foundation and others, to look at various case studies to look at the delivery of new housing with a desire to learn lessons and look at how new developments can be more accessible to all modes - not just the car, and of course better access to bus services.

The report, "Transport for New Homes" found that, amongst other things new homes – many of which are in rural county areas - were not properly connected for pedestrians, cyclists or buses. The report has found that planners work with developers "within the red line" of the planning application and the connection of transport to the site was often excluded from consideration. This has led to new "bubbles" of development being isolated.

The planning of development sites should consider the walking distance to bus stops and the corresponding bus catchment areas. This affects the distance between adjacent bus routes and hence the street layout as a whole. CIHT guidance "Buses in Urban Developments" highlights the distances to bus routes from proposed development. This is set out in figure 2 below.

Development should also promote quality development and quality bus provision that is attractive to users with improved access to main corridors, less deviations off route and reduces potential delays with carriageway widths within new development a minimum of 6.5 metres.

Moreover it is essential that if developments are to be made sustainable public transport services are provided and funded from very early in the development to create transportation habits.

Situation	Maximum walking distance
Core bus corridors with two or more high-frequency services	500 metres
Single high-frequency routes (every 12 minutes or better)	400 metres
Less frequent routes	300 metres
Town/city centres	250 metres

Figure 2: Recommended Walking Distances to Bus Routes (Source CIHT Buses in Urban Developments, 2018)

For sites to accommodate buses we would advise that the general layout should be as highlighted in figure 3.

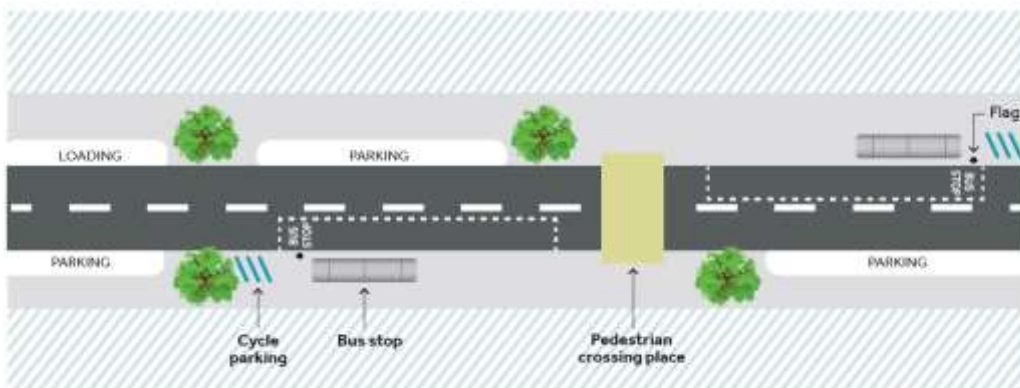


Figure 3: Example of Bus Stop Layout (Source CIHT Buses in Urban Developments, 2018)

We would therefore propose a policy which states "masterplanning and planning applications should promote quality development and quality bus provision that is attractive to users with improved access to main corridors, less deviations off route and which reduces potential delays, with carriageway widths within new development a minimum of 6.5 metres where appropriate. In addition high quality bus infrastructure should be provided as part of the development to enable modal shift away from the private car and promote sustainable transport modes"

In February 2022, *Transport for New Homes* published a report "*Building Car Dependency*". As part of the study, field visits were conducted to 20 new housing developments across England. The report found that greenfield housing has become even more car-based than before. The report notes the trend for building with the car in mind extended beyond housing, with out-of-town retail, leisure, food outlets and employment orientated around new road systems. The report concludes, along with other recommendations that the new car-based estates do not suit all ages and aspirations - many younger people and families do not want the isolation in terms of transport and amenities.

Younger people want the independence and older people benefit from being part of a walkable community at a more human scale. We need new homes for people who don't want to drive everywhere and want a truly local, and genuinely vibrant community to live in and that the development should be designed around a series of boarding points for a frequent and modern public transport network linking to and serving the wider area. This network can be rail, light rail, tram, bus or a mix, and the service needs to be in place from day one when people move in.

Importantly, the report also concluded that we need a shift from expensive new roads and improved junction capacity to the construction of better local public transport networks. This is a more modern and low-carbon way to support new homes and associated development. Public funds from Homes England, DfT as well as from developers need to be urgently directed to sustainable modes. New public transport infrastructure brings people into town and city centres and provides opportunities for building attractive places not dominated by the car, as increasingly seen in many successful smaller and larger cities in other parts of the world.

Finally the *Building Car Dependency* Report also recommended that we need to apply public transport expertise early on in the production of local and strategic plans, with Great British Railways having a formal and proactive role, as with Active Travel England and bus companies who understand from experience what they need in terms of infrastructure, density of development, layout and so on.

Engagement with bus operators on new developments is absolutely essential and we are more than willing to help shape developments and thus what infrastructure is required to facilitate commercial bus operation in the medium to long term after initial 'pump priming' using section 106 funds.

The nature of public transport operations is such that a single development only rarely can support, at full buildout, a new standalone service. In fact, the volume of demand required to support an attractive marketable commercial bus service is such that such services, which are in effect bespoke, only rarely succeed, even in an urban context. **The assumption made by many in the planning community, that even large urban extensions, much less new settlements, can support a meaningful bus operation by virtue of their scale alone and having no regard to the nature of the pre-existing network, is one that regrettably still is expressed within NPPF, despite being quite unfounded.**

[Transport & Movement](#)

We SUPPORT Strategic Policy 5: Delivering Infrastructure.

We Note para 4.130 which states that "the Council will continue to work with various stakeholders and partners, to deliver infrastructure. Public transport and highway infrastructure, including pedestrian and cycle links, is predominantly the responsibility of Hampshire County Council, National Highways, and other transport organisations, such as Network Rail. The Council will be working with these organisations to identify infrastructure that is needed to enable the overall levels of need identified in the Local Plan 2040 to be delivered sustainably." As a Stage Carriage Operator we would like to be embedded in this process.

Accordingly, we consider that this paragraph should reflect the Enhanced Bus Partnership for Hampshire which states at Section 3 "Measures by Hampshire County Council" that :-
"When responding to planning applications, Hampshire County Council will promote strong sustainable transport accessibility principles and encourage developers to engage with bus operators at an early stage of the planning process to ensure operators have the opportunity to inform the development of public transport proposals" and;
"Hampshire County Council will work with bus operators and local planning authorities to develop a set of clear principles and objectives for the provision of bus infrastructure and bus services for all new developments, relative to their size, by September 2023."

This should be reflected in both any policies but also the supporting text.

Our default position is one where we grow a stable network – adding additional journeys in early mornings or late evenings for example to increase the convenience of the bus. Having routes which have little or no variation within them but also respond to changes in market need. This needs to be developed in concert with LTAs so that services (especially where there is influence of public subsidy) can also be stable and encourage growth.

Delivering Infrastructure to Support Growth

In terms of kickstart and developer funding, **it is important that any new infrastructure introduced to facilitate housing and economic growth is mindful of the public transport network and any new infrastructure should be designed to enhance rather than impede this. We would urge the LPA to condition this from the first occupation so that sustainable travel habits can form, which will naturally nurture others' travelling habits when they take up residence.**

Moreover it is essential that if developments are to be made sustainable, public transport services are provided and funded from very early in the development to create transport habits. Bus operators should be statutory consultees on planning applications. It also highlights that we need to change the way we select sites for development - including allocating sites on the edge of existing urban areas to enable more sustainable transport options to be developed. Some of this would need, by its very nature, to be on green belt land.

Local Authority and other pump priming needs to have a long tail so gives operators both the incentive and time to grow the market and allow services to blossom which will in turn lead to frequency and quality improvements.

We have highlighted how development needs to be in the right place to enable accessibility and connectivity by all modes, and how the proportion of developer funding dedicated to transport has significantly reduced in recent years – we would advocate that developer funding be prioritised to transport via LTAs, taking a more proactive role in development planning and development control. We would advocate that Highway Authorities work with bus operators to ensure connectivity forms new development with a suitable period of kick-start funding secured through Section 106 Planning Agreements to ensure longevity of operation, normally for a period of at least seven years and that this requirement is clearly set out at Development Plan stage.

Regulation 123 of the Community Infrastructure Levy (CIL) Regulations 2010 (as amended) indicates that a Charging Authority can publish on its website a list of infrastructure projects or types of infrastructure that it intends will be, or may be, wholly or partly funded by CIL. In addition the LPA can highlight projects or initiatives that can be met through site specific developer contributions. It is essential therefore this is reviewed as part of the Local Plan process to enable the delivery of suitable schemes that arise from development.